



February 7, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Notice of Ex Parte Presentations
MB Docket No. 99-325
47 C.F.R. § 74.1223(a)

Dear Ms. Dortch:

On February 6, 2012, Lynn Claudy, David Layer, Larry Walke and Valerie Schulte of the National Association of Broadcasters (NAB) met with Peter Doyle, Chief, Audio Division and Audio Division staff members Susan Crawford, Jim Bradshaw, Jorden Brinn and Rudy Bonacci to discuss various radio matters, including the latest version of the National Radio Systems Committee (NRSC) in-band/on-channel (IBOC) digital radio standard, NRSC-5-C.

First, concerning digital audio radio, we pointed out that since at least 2005 the FCC has said that it would consider incorporating the NRSC digital radio standard into its rules. The co-sponsors of the NRSC, NAB and CEA, submitted previous versions of the NRSC-5 standard for consideration by the FCC in 2005 and 2008. Recently the NRSC has completed work on an updated version that addresses improvements and refinements to the standard, and the NRSC co-sponsors are poised to submit this new version to the FCC. We encouraged the FCC to incorporate NRSC-5-C into the FCC rules for AM and FM digital broadcasting. We said that codification of the standard would give certainty to broadcasters and manufacturers alike and help spur deployment of digital radio receivers in the marketplace.

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Second, noting that Mr. Doyle had mentioned during a speech to the 2011 IEEE Broadcast Symposium (October 20, 2011) terrain-based propagation modeling for FM radio, we suggested that such modeling may be useful for particular, individual FCC showings, but that the current distance-based allocations model works well.

Lastly, we inquired about approvals of applications for FM translator moves, noting that such approvals had slowed in recent months.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Valerie Schulte". The signature is fluid and cursive, with a large initial "V" and a stylized "S".

Valerie Schulte
Deputy General Counsel
Legal and Regulatory Affairs

Cc: Peter Doyle
Susan Crawford
Jim Bradshaw
Jorden Brinn
Rudy Bonacci